

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:	Vorcinthia Pope)	
)	
	Debtor.)	Case No. 15-33785-KRH
)	Chapter 13
)	
Address)	
	Vorcinthia Pope)	
	5800 Thorndale Ln, Appt 1)	
	Richmond, VA 23234)	
)	

Last four digits of SSN or ITIN: **5919**

NOTICE OF OBJECTION TO PROOF OF CLAIM

Richard J. Oulton, Esq. has filed papers with this court Objecting to a Proof of Claim.

Your rights may be affected. You should read these papers carefully, and discuss them with your attorney in this Bankruptcy Case, if you have one. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before **30 DAYS FROM TODAY**, you or your attorney must:

File with the court and mail a copy to the Debtors' counsel, at the addresses shown below, a written request for a hearing. If you mail your request for hearing to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of the Court
U.S. Bankruptcy Court
701 E. Broad St., Suite 4000
Richmond, VA 23219

Richard J. Oulton, Esq.
America Law Group, Inc.
8501 Mayland Dr. Suite 106
Henrico, VA 23294

You must also attend a hearing to be scheduled at a later date.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion, and may enter an order granting that relief.

Date: March 29, 2016

/s/ Richard J. Oulton, Esq.
Richard J. Oulton, Esq.
America Law Group, Inc.
8501 Mayland Dr. Suite 106
Henrico, VA 23294

Counsel for Debtor in Bankruptcy

CERTIFICATE OF SERVICE
See certification in Application Attached hereto
UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
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OBJECTION TO PROOF OF CLAIM

COMES NOW, America Law Group, Inc., counsel for Debtor(s), and pursuant to FRBP 3001, and 11 USC 502, and objects to the proof of claim of 11, and says as follows:

1. The claim is filed by Community Home Financial Services, Inc. .
2. Upon information and belief of the Debtors, this claim is for a residence that was foreclosed pre-petition. The creditor is NOT entitled to be treated as a secured creditor, but any deficiency may be treated as an unsecured debt. In order for the creditor to be entitled to a deficiency, it must comply with state law. 11 USC 502.
 - a. The subject property was foreclosed in 2009, and not later than 2010 was titled in the name of the foreclosure buyer.
 - b. Pursuant to 11 USC 502(b)(1), the claim should be allowed as an UNSECURED claim because there is no collateral that is subject to repossession or foreclosure..

3. This claim that was filed by Community Home Financial Services, Inc should be disallowed.

WHEREFORE, debtor(s) respectfully requests that your Honorable Court disallow Claim #11, filed by Community Home Financial Services, Inc. in the amount of \$8,883.71, be disallowed and order such other and further relief as is just and proper.

/s/ Richard J. Oulton, Esq.
Richard J Oulton, Esq. VSB#
America Law Group, Inc.
8501 Mayland Dr. Suite 106
Henrico, VA 23294
Tel: 804.308.0051 Fax: 804.308.0053
jkrumbein@krumbeinlaw.com

CERTIFICATE OF SERVICE

I certify that I have this 29 March 2016, transmitted a true copy of the foregoing application electronically through the court's CM/ECF system to the Chapter 13 Trustee and US Trustee, and by regular mail to the to the Debtor and

Community Home Financial Services, Inc
c/o C. Ellis Brazeal, III
1819 5th Ave N. Suite 1100
Birmingham, AL 35203

Clearspring Loan Services
c/o Payment Processing
18451 North Tollway Suite 100
Dallas, TX 75287

/s/ Richard J. Oulton, Esq.
Counsel for the Debtor(s) in Bankruptcy